



Building Owners & Managers Association
Seattle King County
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Stoyan Bumbalov, Managing Director
WA State Building Code Council
1500 Jefferson St SE
Olympia, WA 98501

Via Email: sbcc@des.wa.gov
CC: stoyan.bumbalov@des.wa.gov

RE: Code proposals with respect to “Electrification” that would ban natural gas/fossil fuels as an energy source.

Members of the Washington State Building Codes Council,

On behalf of the Building Owners and Managers Association (BOMA), we wish to point out several unanswered questions that need to be addressed before code proposals are adopted.

First, we would like to clearly state that, as the voice for commercial real estate for our members and our industry, we recognize and support the need to actively reduce carbon emissions. We support achievable, challenging, energy efficiency measures that reduce the impacts of climate change.

We are concerned that there are no transparent analysis and answers to the questions below. There can be profound consequences that must be considered and further understood before making recommendations to lawmakers that would in effect, make our businesses and economy reliant on just one energy source.

What comprehensive and reliable sources have addressed the following issues?

- a. Long-term load growth and system capacity.
- b. Long-term generation capacity.
- c. Long-term transmission capacity
- d. Long-term system risk liabilities and reliability.
- e. What are the implications for contract purchase of generation power?
- f. The impacts of growing stress on water for power generation, agriculture, etc. (how does water availability impact electrification over time?).
- g. An analysis and magnitude of projected escalating costs to both the utilities and the consumers due to:
 - Grid infrastructure, grid modernization, transmission capacity and reliability, transformers, vaults, etc.
 - The increasing stress on water resources
 - Future removal of dams

- Low water years, snowpack issues
- a. Is there any analysis that indicates Washington State businesses and residents won't experience rolling blackouts due to reliance on one energy source and the loss of natural gas generation as a system backup?
- b. We all need to know these answers before we venture forward and there needs to be a completed and comprehensive analysis of risks: with all our energy sources in one basket, what perfect storm scenarios exist?

What will be the impacts to Washington State consumers from the coming elevated competition in the form of other utilities along the West Coast when they come seeking to compete for either our water resources or power from our system?

We believe that before energy policy is decided and code development moves forward, the answers to these critical forward-thinking impacts must be transparently available. As we work to reduce carbon emissions, much more about future impacts and consequences need to be available to policy makers and consumers. And we should have a long-term clear picture of costs and risks associated with our actions.

Thank you for your consideration.

Sincerely,



Rod Kauffman | President
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The Building Owners and Managers Association (BOMA) Seattle King County is a 501 C6 non-profit trade association founded in 1912. BOMA's 270 member firms employ nearly 18,000 people and provide office space for more than 350,000 Seattle-Bellevue area workers.

BOMA membership includes several hundred real estate management professionals from 100 small and medium size businesses who own and manage nearly 115 million square feet of office, commercial, retail and industrial properties. BOMA's 170 Industry Partner member firms are represented by several hundred individuals who provide goods and services to the commercial real estate industry.

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